



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

TALYSIA FRANCIS
Assistant Corporation Counsel
Labor & Employment Law Division
(212) 356-2465
tafranci@law.nyc.gov

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BY ECF and Email (ALCarterNYSDChambers@nysd.uscourts.gov)

Honorable Andrew L. Carter, Jr.
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Rm 435
New York, New York 10007

Re: Dowdy, et al. v. City of New York, et al.
Docket No. 22-CV-6284 (ALC)

Dear Judge Carter:

I am an Assistant Corporation Counsel in the office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants City of New York and the New York City Department of Sanitation (“Defendants”) in the above-referenced action. Defendants’ motion to dismiss the First Amended Class Action Complaint was fully submitted as of March 30, 2023 and is sub judice. I write to inform Your Honor of the Opinion and Recommendation issued by Arbitrator Martin F. Scheinman in Matter of the Arbitration between City of New York and Law Enforcement Employees Benevolent Association Industries, Impasse Panel: Associate Sanitation Enforcement Agents, dated August 21, 2023, (“Impasse Panel Recommendation”) a copy of which is annexed hereto.

The Impasse Panel Recommendation may provide the Court with helpful background information regarding Plaintiff’s allegation that Sanitation Enforcement Agents and Associate Sanitation Enforcement Agents (“ASEAs”) perform comparable work yet receive unequal pay as compared to Sanitation Police Officers.

We thank the court for its consideration of this submission.

Respectfully Submitted,

/s/ Talysia Francis
Talysia Francis
Assistant Corporation Counsel

Encl.

cc: Phillip H. Seelig, Esq. (via ECF)
Seelig Law Offices, LLC
Attorneys for Plaintiffs
299 Broadway, Suite 1600
New York, NY 10007
(212) 766-0600
phil@pseeliglaw.com

Matthew J. Porcaro, Esq. (via ECF)
Seelig Law Offices, LLC
Attorneys for Plaintiffs
299 Broadway, Suite 1600
New York, NY 10007
(212) 766-0600
matt@pseeliglaw.com

Steven J. Moser, Esq. (via ECF)
Moser Law Firm, PC
Attorneys for Plaintiffs
5 E Main Street
Huntington, NY 11743
(516) 671-1150
steven.moser@moserlawfirm.com